

Before the  
Federal Communications Commission  
Washington, DC 20554

RECEIVED

SEP 14 1992 ORIGINAL

MAIL BRANCH

FILE

In the matter of

Amendment of the Amateur Service  
Rules to Include Novice Class  
Operator License Examinations  
in the Volunteer-Examiner  
Coordinator Examination System

PR Docket No. 92-154

RECEIVED

SEP 14 1992

In the above captioned NPRM, statistics are cited regarding the decline in Novice class license applicants. Representative numbers are given for the entire calendar year of 1990 and these statistics are compared to a single month (January, 1992).

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Additionally, statistics are given to indicate a higher error rate on Novice applications than is the case on applications submitted by volunteer examiners.

Aside from the obvious statistical anomaly caused by comparing 12 month's data to one month's data and attempting to draw any substantive conclusions from such data, the basic underlying logic employed to justify changing this program appears to be flawed.

#### APPARENT BENEFIT TO THE COMMISSION:

If the number of applicants for Novice privileges is declining then the representative burden on the commission caused by any defective applications is also declining at a rate that is at least linear.

From the Commission's standpoint, it would seem that (aside from concern about possible fraud) this one issue appears to constitute the benefit that the Commission would enjoy from the change.

#### COUNTER ARGUMENT:

Since no claim of widespread fraud (or even minimal fraud) has ever been made by the Commission with regard to the use of two Ad Hoc General class license holders (or higher) performing the function of examination proctors for the Novice applicants, it would seem on the face of the proposal that the only benefit to the Commission would be a minimal decrease in returns of flawed applications and the resultant lessening of the administrative burden for the Commission.

No. of Copies rec'd  
List A B C D E

0710

Page Two:

Comment to NPRM: PR Docket No. 92-154

**APPARENT BENEFIT TO THE APPLICANT:**

A standardized testing procedure (in the form of questions derived from a standard question pool) is the primary benefit to the applicant.

**COUNTER ARGUMENT:**

The commission, by simple rule making can require the use of questions from a standard question pool. It is not necessary to commingle the concept of the V-E/VEC administration of examinations and (the) use of a question pool. Also, the entire concept of using three examiners, unknown and unavailable to potential Novice class license applicants (except under very specific and structured circumstances) is a diminution of the current "user friendly" system and therefore can be expected to add a layer of bureaucracy (whose) benefit to the applicant (other than the question pool issue) has not been proven or even adequately explained by those requesting the change in the Commission's rules.

**APPARENT BENEFIT TO THE VOLUNTEER EXAMINER:**

By increasing the available pool of applicants required to reimburse the V-E for "necessary and prudent out of pocket expenses", additional revenue could be realized by those individuals administering the examination.

**COUNTER ARGUMENT:**

Since the number of applicants is decreasing, the additional revenue obtained will be minimal. Also, the Novice license is the only entry license with CW privileges (albeit frequency restricted) and as such deserves the continuance of a "no fee" approach to encourage that the maximum number of individuals attempt to gain access to the full spectrum which is of course denied the "No Code" Technician licensee.

**SUMMARY:**

In summary, this proposed change in the Commission rule comes down to a simple question: would the change diminish the incidence of flawed applications for the Novice class of license. All other arguments are subordinate to this question and are in some cases specious and without necessary supporting documentation or research that proves a definite benefit to either the citizen seeking a Novice license or to the Commission.

Page Three

Comment to NPRM: PR Docket No. 92-154

PROPOSAL:

In order to continue the Commission's support and encouragement of (those) applicants interested in the Novice class of license and its additional privileges, the Commission should mandate that as a requirement for continued VEC certification status all completed applications for the Novice class of license will be mailed to one of the eighteen (18) currently existing VEC entities.

Further, the Commission should continue the present program of requiring two (2) holders of General or higher class license of the applicant's choosing (who cannot charge for their services) instead of three volunteer certified examiners to administer the Novice class examination.

Additionally, the receiving VEC will check the application for errors and should errors be found, the VEC will return the application to the primary submitting examination proctor whose name appears at the top of FCC form 610. This person will then correct the errors and again forward the application to the respective VEC who will then (if the application is now correct) forward the application to the Commission for action.

Finally, the Commission should order that all questions that are used on any Novice examination will be taken from a comprehensive list of questions prepared in the same manner and by the same entity as now prepares and furnishes examination questions for all other classes of licenses currently offered by the Commission.

If the program is changed in this manner, all of the legitimate objections to the current situation are met and the Commission's burden with respect to flawed applications can be expected to reach the level now evidenced by the VE/VEC program.

Respectively Submitted on September 10, 1992 by:

John Loughmiller, KB9AT  
2535 Ridge Park Drive  
Cumming, Georgia 30130